

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STANLEY BOIM, Individually and as
Administrator of the Estate of David Boim,
deceased, and JOYCE BOIM,

Plaintiffs,

v.

Civil No. 00-cv-2905

QURANIC LITERACY INSTITUTE, HOLY
LAND FOUNDATION FOR RELIEF AND
DEVELOPMENT, ISLAMIC ASSOCIATION
FOR PALESTINE, AMERICAN MUSLIM
SOCIETY, AMERICAN MIDDLE EASTERN
LEAGUE FOR PALESTINE, UNITED
ASSOCIATION FOR STUDIES AND
RESEARCH, MOHAMMED ABDUL HAMID
KHALIL SALAH, MOUSA MOHAMMED ABU
MARZOOK, AMJAD HINAWI, and THE
ESTATE OF KHALIL TAWFIQ AL-SHARIF,

Defendants.

**MOTION FOR JOINDER OF NON-PARTIES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 25(C)**

Pursuant to Federal Rule of Civil Procedure 25(c), plaintiffs Stanley Boim, individually and as Administrator of the Estate of David Boim, deceased, and Joyce Boim request that the court commence proceedings to effectuate the joinder of non-parties American Muslims for Palestine (“AMP”), The Americans for Justice in Palestine Educational Foundation (“AJP”), Rafeeq Jaber, Abdelbasset Hamayel, and Osama Abu Irshaid (Jaber, Hamayel and Irshaid, together, the “Individual Defendants”), as judgment debtors in this action because these entities and persons are alter-egos and successors of one or more of the defendants in this action against which this court entered judgments. Plaintiffs further request that the Court permit discovery in

connection with these proceedings, set a hearing to determine whether AMP, AJP and the Individual Defendants are liable as alter-egos and/or successors (or permit submission of evidence through an appropriate motion), and, upon completion of appropriate discovery and the hearing, order that the judgments entered in this action are jointly and severally enforceable against AMP, AJP and the Individual Defendants. In support of this motion, plaintiffs submit and incorporate the accompanying memorandum.

WHEREFORE, for the reasons set forth in the accompanying memorandum, plaintiffs Stanley and Joyce Boim respectfully request that the Court grant this motion and (i) permit appropriate discovery in connection with these Rule 25(c) proceedings; (ii) set a hearing to determine following appropriate discovery whether AMP, AJP and the Individual Defendants are liable as alter-egos and/or successors of one or more of the liable defendants in this action (or permit submission of evidence through an appropriate motion in the event that there are no material disputed issues of fact); (iii) join AMP, AJP and the Individual Defendants as judgment debtors if the Court determines that they are alter-egos and/or successors; (iv) order that the judgments in this action are jointly and severally enforceable against AMP, AJP and the Individual Defendants; and (v) grant such further relief as the Court deems just and appropriate.

Dated: May 12, 2017

Respectfully submitted,

/s/ Stephen J. Landes

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on May 12, 2017 he caused the foregoing MOTION FOR JOINDER OF NON-PARTIES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 25(C) to be served upon (i) Islamic Association for Palestine (“IAP”); (ii) American Muslim Society (“AMS”); (iii) American Muslims for Palestine (“AMP”); (iv) Americans for Justice in Palestine Educational Foundation (“AJP”); (v) Rafeeq Jaber; (vi) Abdelbasset Hamayel; and (vii) Osama Abu Irshaid, by (1) electronically filing with the Clerk of the Court for the Northern District of Illinois using the CM/ECF system, and thereby serving by e-mail notification upon counsel for all parties of record and (2) U.S. Mail, postage pre-paid, to the following persons at the following addresses:

AMS	Rafeeq Jaber Last Known Registered Agent for AMS Jaber Financial Services 10661 S Roberts Rd, Ste 200 Palos Hills, IL 60465-1988 Rafeeq Jaber 9748 Meade Ave Oak Lawn, IL 60453
IAP	Mohammed Lafi Last Known Registered Agent for IAP 401 S. Sherman #219 Richardson, TX 75081
AMP	Abdelbasset Hamayel Registered Agent for AMP 10101 S Roberts Rd Palos Hills, IL 60465 American Muslims for Palestine 10063 S. 76th Ave Bridgeview, IL 60455

AJP	<p>Abdelbasset Hamayel Books and Record Keeper for AJP 10101 S Roberts Rd Palos Hills, IL 60465</p> <p>Americans for Justice in Palestine Educational Foundation 10063 S. 76th Ave Bridgeview, IL 60455</p>
Rafeeq Jaber	<p>Jaber Financial Services 10661 S Roberts Rd, Ste 200 Palos Hills, IL 60465-1988</p> <p>9748 Meade Ave Oak Lawn, IL 60453</p>
Abdelbasset Hamayel	<p>9400 S. Oketo Ave. Bridgeview, IL 60455</p> <p>American Muslims for Palestine 10063 S. 76th Ave Bridgeview, IL 60455</p>
Osama Abu Irshaid	<p>8145 Ridge Creek Way Springfield, VA 22153</p> <p>American Muslims for Palestine, DC Office 6404 Seven Corners Place Suite 7 Falls Church, VA 22044</p>

/s/ Joshua Fliegel